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5 **FREEDOM LAW FIRM**

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12 and all others similarly situated*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 Richard Klein and Raymond Urias, individually and
16 on behalf of all others similarly situated,

17 Plaintiffs,

18 -vs.-

19 National Collegiate Student Loan Trust AKA
20 National Collegiate Master Student Loan Trust I;
21 National Collegiate Student Loan Trust 2003-1;
22 National Collegiate Student Loan Trust 2004-1;
23 National Collegiate Student Loan Trust 2004-2;
24 National Collegiate Student Loan Trust 2005-1;
National Collegiate Student Loan Trust 2005-2;
National Collegiate Student Loan Trust 2005-3;
National Collegiate Student Loan Trust 2006-1;
National Collegiate Student Loan Trust 2006-2;
National Collegiate Student Loan Trust 2006-3;
National Collegiate Student Loan Trust 2006-4;
National Collegiate Student Loan Trust 2007-1;
National Collegiate Student Loan Trust 2007-2;
National Collegiate Student Loan Trust 2007-3;
National Collegiate Student Loan Trust 2007-4;

25 Defendant.

CASE NO:2:22-cv-01392-GMN-BNW

26 **CLASS ACTION**

27 **STIPULATION AND ORDER FOR
28 EXTENDING TIME FOR PLAINTIFFS
TO RESPOND TO DEFENDANTS'
MOTION TO DISMISS**

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs, Richard Klein and Raymond Urias ("Plaintiffs") and National Collegiate Student Loan Trust et al ("Defendants"), by and

1 through their Respective counsel of record, hereby stipulate, agree and respectfully request that
 2 the Court extend the deadline for the Plaintiffs to file their amended complaint to Defendant's
 3 Motion to Dismiss from November 30, 2022, to December 23, 2022. Counsel for Plaintiffs
 4 respectfully request time in light of their current schedule and the complexity of the matter. The
 5 parties have agreed that neither will seek to commence any discovery until, at the earliest,
 6 Defendants file their response to the Amended Complaint in a manner consistent with LR 26-1.
 7 The parties nevertheless reserve their rights to oppose the commencement of discovery, on
 8 grounds that it is premature or otherwise improper, including without limitation by seeking an
 9 order staying discovery pursuant to Fed. R. Civ P. 26. The parties also reserve their rights to
 10 request a lengthier discovery period than the one stated in LR 26-1.
 11
 12

13 Dated: November 21, 2022
 14
 15

FREEDOM LAW FIRM

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Dated November 21, 2022

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ORDER

IT IS SO ORDERED.

Dated this 29 day of November, 2022.

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT